

ORIGINAL
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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

PETER CHONG,
a/k/a Chong Bing-Keung,
a/k/a "Uncle",

NO. CR. 92-0260-DLJ

VIOLATIONS:

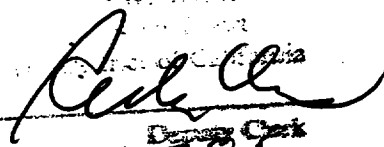
18 U.S.C. § 1962(c)
RICO
18 U.S.C. § 1962(d)
RICO CONSPIRACY
18 U.S.C. § 371
CONSPIRACY
18 U.S.C. § 1958
MURDER FOR HIRE
21 U.S.C. § 846
HEROIN CONSPIRACY
21 U.S.C. § 846
COCAINE CONSPIRACY
18 U.S.C. § 1951
CONSPIRACY TO INTERFERE WITH
COMMERCE
18 U.S.C. § 892
EXTENSION OF DEBT
18 U.S.C. § 894
COLLECTION OF DEBT
18 U.S.C. § 844(i)
ARSON

UNDER SEAL OF COURT

SUPERSEDING INDICTMENT

I hereby certify that the annexed
instrument is a true and correct copy
of the original on file in my office.

RICHARD W. WIEKING

By 
Deputy Clerk

Date 4-5-95

1 COUNT ONE: 18 U.S.C. § 1962(c)

2 The Grand Jury charges:

3 GENERAL ALLEGATIONS

4 1. At all times material to this indictment:

5 a. The Wo Group was a Hong Kong based organization
6 consisting of at least ten triads (secretive criminal
7 fraternities which evolved from secret political societies formed
8 in China during the 17th Century), one of which was the Wo Hop To
9 Triad (hereinafter "Wo Hop To"). Starting in the mid-1980's, the
10 Wo Hop To recruited membership in the Northern California area
11 and, in the early 1990's, became the dominant force in Asian
12 organized crime in the San Francisco Bay Area.

13 b. PETER CHONG, a/k/a Chong Bing-Keung, a/k/a "Uncle",
14 emerged as the San Francisco based leader of the Wo Hop To on the
15 West Coast of the United States. As leader of the Wo Hop To in
16 San Francisco, PETER CHONG coordinated the sponsorship,
17 recruitment, and formal initiation (often occurring in Hong Kong)
18 of members into the Wo Hop To. In addition, PETER CHONG
19 organized and supervised a group of underlings, primarily
20 consisting of Asian males, aged fourteen to twenty five, who
21 followed the instructions, often criminal in nature, of PETER
22 CHONG and other members of the Wo Hop To. The underlings of the
23 Wo Hop To were organized in a fashion similar to that employed by
24 the Triad societies in Hong Kong. A residence owned by PETER
25 CHONG, located at 1220-24 47th Avenue, San Francisco, California,
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1 was used by the underlings as both a place to live and a
2 headquarters for the planning and implementation of criminal
3 activities.

4 c. The Hop Sing Tong (literally meaning "The United
5 Victorious Hall") was a San Francisco based national business
6 association, formed by Chinese immigrants in San Francisco in the
7 19th century, with additional chapters in Los Angeles,
8 California; Portland, Oregon; Seattle, Washington; and Denver,
9 Colorado. The San Francisco branch of the Hop Sing Tong
10 (hereinafter "Hop Sing Tong") was influenced and permeated by
11 younger members, led by Raymond Chow, a/k/a Chow Kwok Cheung,
12 a/k/a "Shrimp Boy", a/k/a "Ah Gong", who used the Hop Sing Tong
13 as a front for conducting a wide range of criminal activity. The
14 1967 Hop Sing Tong Rules and Regulations provided that "All
15 members of this Tong are authorized to conduct legal and other
16 than legal business within the territory covered by the Tong."

17 d. Raymond Chow was a member of the Hop Sing Tong and
18 the chief architect and leader of the criminal activities engaged
19 in from and through that organization. Raymond Chow organized
20 and recruited, under the auspices of the Hop Sing Tong, a group
21 of "underlings," primarily Asian males ranging in age from
22 fourteen to their early twenties. The underlings of the Hop Sing
23 Tong were organized in a fashion similar to that employed by the
24 Triad societies in Hong Kong. The underlings followed the
25 orders, often criminal in nature, of Raymond Chow.

e. The On Leong Tong was a Chinese fraternal and business association centered in the Eastern United States with a major chapter located in Boston, Massachusetts. Commencing in the 1980s, Wayne Kwong became a member and leader, with the designation "Office Bearer," of the On Leong Tong in Boston, Massachusetts. Wayne Kwong organized and recruited, under the auspices of the On Leong Tong, a group of "underlings," primarily Asian males ranging in age from sixteen to their mid twenties. Under the leadership of Wayne Kwong, the On Leong Tong membership and underlings engaged in a wide variety of criminal activities, including loansharking, extortion, and drug distribution, concentrated primarily in the Chinatown section of Boston, Massachusetts.

f. Commencing in the early 1990s, **PETER CHONG** and Raymond Chow joined together in a "brotherhood," consisting of the membership and underlings of the Wo Hop To and Hop Sing Tong. **PETER CHONG** was the overall leader of the alliance while Raymond Chow served as his second in command. However, both **PETER CHONG** and Raymond Chow continued to exercise day to day control over their respective members and underlings. The Wo Hop To and Hop Sing Tong exercised control over a significant portion of criminal activities in the Chinatown sections of San Francisco and Oakland, California. The criminal activities included the distribution of controlled substances, extortion, loansharking, gambling, and firearms trafficking.

1 g. Commencing in August, 1991, PETER CHONG and
2 Raymond Chow invited Wayne Kwong to become a member of the then
3 fully functioning San Francisco alliance of the Wo Hop To and Hop
4 Sing Tong, and share both the business and profits of the
5 alliance's criminal ventures throughout the Northern California
6 area and elsewhere. Wayne Kwong joined the alliance of the San
7 Francisco Wo Hop To, San Francisco Hop Sing Tong, and Boston On
8 Leong Tong.

9 h. After Wayne Kwong joined the alliance, PETER CHONG
10 and Raymond Chow specifically invited Kwong to assist in the
11 formation of and become a member and leader of a new Chinese
12 organized crime association named, "Tien Ha Wui," translated as
13 "The Whole Earth Association." The goal of this association was
14 stated by PETER CHONG to be the unification of all Asian
15 organized crime groups in the United States under the leadership
16 of PETER CHONG. PETER CHONG indicated that the plan was for the
17 Tien Ha Wui to coordinate the distribution of heroin and cocaine,
18 loansharking, gambling, firearms trafficking, prostitution, and
19 illegal alien smuggling. PETER CHONG further stated that any
20 resistance from other Asian organized crime groups to the Tien Ha
21 Wui would be suppressed through violent means.

22 i. The primary sources of revenue for the planned
23 Tien Ha Wui organization were to be: (1) the continued revenues
24 generated by the criminal activities of the alliance of the Hop
25 Sing Tong, the Wo Hop To, and the On Leong Tong in the Northern
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1 District of California and elsewhere; (2) the revenues generated
2 from an arson of a residential building in San Francisco,
3 California; and (3) the anticipated revenues from a nationwide
4 distribution of cocaine and heroin by the Tien Ha Wui.

5 THE RACKETEERING ENTERPRISE

6 2. PETER CHONG, defendant herein; Raymond Chow, Wayne
7 Kwong, Anthony Ma, Michael Eng, Andy Li, Norman Sun, Margie Lee,
8 Linh Cuong Viet, Fee Yue, Brandon Casey, Tony Young, and others
9 known and unknown to the Grand Jury, constituted an "enterprise"
10 as defined by Title 18, United States Code, Section 1961(4), that
11 is, a group of individuals associated in fact, which was engaged
12 in and the activities of which affected interstate and foreign
13 commerce. The enterprise consisted of the leadership,
14 membership, underlings, and associates of the San Francisco Wo
15 Hop To, San Francisco Hop Sing Tong, and Boston On Leong Tong.
16 Such activities included the felonious dealing in heroin and
17 cocaine; and acts involving murder, arson, gambling, and
18 extortionate credit transactions to promote and protect the
19 enterprise.

20 3. From in or about early 1990 until at least June, 1992,
21 in the Northern District of California and elsewhere, PETER
22 CHONG, defendant herein, Raymond Chow, Wayne Kwong, Anthony Ma,
23 Michael Eng, Andy Li, Norman Sun, Margie Lee, Linh Cuong Viet,
24 Fee Yue, Brandon Casey, Tony Young, and various other individuals
25 known and unknown to the Grand Jury, being persons employed by
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1 and associated with the above described enterprise, which was
2 engaged in and the activities of which affected interstate and
3 foreign commerce, unlawfully and knowingly did conduct and
4 participate, directly and indirectly, in the conduct of the
5 affairs of the above described enterprise, through a pattern of
6 racketeering activity, as defined by Title 18, United States
7 Code, Sections 1961(1) and 1961(5), consisting of racketeering
8 acts 1 through 11, as alleged in paragraph 11 below, and through
9 the collection of unlawful debts, as defined by Title 18, United
10 States Code, Section 1961(6), consisting of unlawful debt
11 collections 1 through 4, as alleged in paragraph 12 below.

12 MANNERS AND MEANS OF THE RACKETEERING ENTERPRISE

13 4. It was part of the racketeering enterprise, in an
14 attempt to consolidate power among Asian organized crime
15 throughout the United States, to send, on three occasions,
16 underlings of the Wo Hop To and Hop Sing Tong from San Francisco
17 to Boston, Massachusetts, to assassinate Bike Ming, the primary
18 rival to Wayne Kwong in the Chinatown section of Boston,
19 Massachusetts.

20 5. It was part of the racketeering enterprise to seek to
21 control a significant portion of the importation and distribution
22 of heroin throughout the United States by Asian organized crime.
23 As a first step toward that goal, it was part of the racketeering
24 enterprise to secure heroin in the Eastern United States, much of
25 it imported from Taiwan through the Port of Philadelphia,
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1 Pennsylvania, and arrange for its transportation to and
2 distribution throughout the Northern California area.

3 6. It was part of the racketeering enterprise to generate
4 income for the enterprise, to import cocaine from Mexico and
5 other locations, distribute a portion of that cocaine throughout
6 Northern California, and transport and distribute the remaining
7 portion of the cocaine to cities throughout the Eastern United
8 States.

9 7. It was part of the racketeering enterprise to loan, at
10 usurious rates of from 7% to 10% per week, money to residents of
11 the Chinese communities in the Northern District of California,
12 and collect the debts and interest payments from those
13 individuals. It was further part of the racketeering enterprise
14 to, through acts and threats of acts of violence, collect
15 loanshark victim payments from residents of the Chinese
16 communities in the Northern District of California.

17 8. It was part of the racketeering enterprise to, in an
18 attempt to generate revenue for the enterprise, commit the arson
19 of a residential building, 1220-24 47th Avenue, San Francisco,
20 California, belonging to family members of PETER CHONG, in the
21 Northern District of California.

22 9. It was part of the racketeering enterprise, in an
23 effort to generate revenue for the enterprise, to collect
24 protection fees from numerous illegal gambling dens and legal
25 restaurants located throughout the Chinatown section of San
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1 Francisco, California.

2 10. It was part of the racketeering enterprise, in an
3 effort to generate revenue for the enterprise, to operate a pool
4 selling and bookmaking operation, with and without writing, in
5 the Chinatown section of San Francisco, California and elsewhere.

6 PATTERN OF RACKETEERING ACTIVITY

7 11. The pattern of racketeering activity through which
8 PETER CHONG, defendant herein, Raymond Chow, Wayne Kwong, Anthony
9 Ma, Michael Eng, Andy Li, and others known and unknown to the
10 Grand Jury, conducted and participated, directly and indirectly,
11 in the conduct of the affairs of the enterprise, consisted of the
12 following:

13 Racketeering Act One

14 As charged in Count Four of this Indictment, which is
15 incorporated by reference as if set forth in full herein, from
16 September, 1991 through April, 1992, in the Northern District of
17 California, and elsewhere, PETER CHONG, Raymond Chow, and Wayne
18 Kwong caused "underlings" of the San Francisco Wo Hop To and San
19 Francisco Hop Sing Tong, including but not limited to Qui Tu
20 Luong and Brandon Casey to travel, interstate, from San
21 Francisco, California to Boston, Massachusetts, with intent to
22 murder Bike Ming, a member of the "Ping On Gang" and rival of
23 Wayne Kwong, as consideration for the receipt of and as
24 consideration for a promise and agreement to pay anything of
25 pecuniary value, in violation of 18 U.S.C. § 1958.

1 Racketeering Act Two

2 As charged in Count Five of this Indictment, which is
3 incorporated by reference as if set forth in full herein, from
4 January, 1991 through May 30, 1992, in the Northern District of
5 California and elsewhere, PETER CHONG, Raymond Chow, Wayne Kwong,
6 Michael Eng, Anthony Ma, and others known and unknown to the
7 grand jury, did knowingly, and intentionally conspire,
8 confederate and agree to distribute heroin, a Schedule I
9 controlled substance, in violation of 21 U.S.C. § 846.

10 Racketeering Act Three

11 As charged in Count Six of this Indictment, which is
12 incorporated by reference as if set forth in full herein, from
13 January, 1991 through May 30, 1992, in the Northern District of
14 California, the Central District of California, and elsewhere,
15 PETER CHONG, Raymond Chow, Wayne Kwong, Andy Li, and others known
16 and unknown to the Grand Jury, knowingly and intentionally
17 conspired, confederated and agreed to distribute cocaine, a
18 Schedule II controlled substance, in violation of 21 U.S.C. §
19 846.

20 Racketeering Act Four

21 On or about September 21, 1991, in the Northern
22 District of California, PETER CHONG, Raymond Chow, Andy Li, Lee
23 Chol-Soo, and others known and unknown to the Grand Jury,
24 willfully and maliciously set fire to and burned, caused to be
25 burned, and aided, counseled, and procured the burning of an
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1 inhabited structure (to wit, 1220-24 47th Avenue, San Francisco),
2 in violation of California Penal Code § 451.

3 Racketeering Act Five

4 Between in or about January, 1991 through May, 1992, in
5 the Northern District of California, PETER CHONG, Raymond Chow,
6 and others known and unknown to the Grand Jury, committed the
7 following acts, any one of which alone constitutes Racketeering
8 Act 5:

9 a. Between in or about January, 1991 through May,
10 1992, PETER CHONG, Raymond Chow, and others known and unknown to
11 the Grand Jury, obtained money from others (to wit, operators of
12 gambling dens and restaurants in the Chinatown section of San
13 Francisco, California), with their consent, through the wrongful
14 use of fear as that term is defined by California Penal Code §
15 519.1, to wit, the threat to do an unlawful injury to their
16 person and property and the person and property of a third
17 person, in violation of California Penal Code § 518.

18 b. As charged in Count Seven of this Indictment,
19 which is incorporated by reference as if set forth in full
20 herein, between in or about January, 1991 through May, 1992, in
21 the Northern District of California, PETER CHONG and Raymond Chow
22 knowingly conspired and agreed together and with other persons
23 both known and unknown to the Grand Jury, to obstruct, delay, and
24 affect commerce by extortion (to wit, the obtaining of property
25 from another, with his consent, induced by wrongful use of actual
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1 and threatened force, violence, and fear) of operators of
2 gambling dens and restaurants in the Chinatown section of San
3 Francisco, California, in violation of Title 18, United States
4 Code, Section 1951.

5 Racketeering Act Six

6 Between in or about March, 1991 through July, 1992, in
7 the Northern District of California, and elsewhere, the
8 defendants, PETER CHONG, Raymond Chow, Norman Sun, Margie Lee,
9 Linh Cuong-Viet, and others known and unknown to the Grand Jury,
10 committed the following acts, any one of which alone constitutes
11 Racketeering Act 6:

12 a. As charged in Count Nine of this Indictment, which
13 is incorporated by reference as if set forth in full herein, from
14 on or about March, 1991 through July, 1992, in the Northern
15 District of California and elsewhere, PETER CHONG, Raymond Chow,
16 Norman Sun, Margie Lee, Linh Cuong-Viet, and others known and
17 unknown to the grand jury, knowingly and intentionally conspired,
18 confederated, and agreed to make extortionate extensions of
19 credit, as that term is defined in 18 U.S.C. § 891(6), in
20 violation of Title 18, United States Code, Section 892.

21 b. As charged in Count Ten of this Indictment, which
22 is incorporated by reference as if set forth in full herein, from
23 on or about March, 1991 through July, 1992, in the Northern
24 District of California and elsewhere, PETER CHONG, Raymond Chow,
25 Norman Sun, Margie Lee, Linh Cuong Viet, and others known and
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1 unknown to the grand jury, knowingly and intentionally conspired,
2 confederated, and agreed, to participate and use extortionate
3 means, as that term is defined in 18 U.S.C. § 891(7), to collect
4 and attempt to collect any extensions of credit and to punish any
5 person for the nonrepayment of the extensions of credit, in
6 violation of Title 18, United States Code, Section 894.

7 Racketeering Act Seven

8 As charged in Count Eleven of this Indictment, which is
9 incorporated by reference as if set forth in full herein, on or
10 about and between May, 1991 and June, 1992, in the Northern
11 District of California, PETER CHONG, Raymond Chow, Margie Lee,
12 Linh Cuong Viet, and others known and unknown to the Grand Jury,
13 made extortionate extensions of credit, as that term is defined
14 in 18 U.S.C. § 891(6), to a person whose identity is known to the
15 Grand Jury ("extortionate victim 1"), in violation of Title 18,
16 United States Code, Section 892.

17 Racketeering Act Eight

18 Between in or about March, 1991 through July, 1992, in
19 the Northern District of California, and elsewhere, the
20 defendants, PETER CHONG, Raymond Chow, Norman Sun, and others
21 known and unknown to the Grand Jury, committed the following
22 acts, any one of which alone constitutes Racketeering Act 8:

23 a. As charged in Count Twelve of this Indictment,
24 which is incorporated by reference as if set forth in full
25 herein, on or about and between March, 1991 and July, 1992, in
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1 the Northern District of California, PETER CHONG, Raymond Chow,
2 Norman Sun, made extortionate extensions of credit, as that term
3 is defined in 18 U.S.C. § 891(6), to a person whose identity is
4 known to the Grand Jury ("extortionate victim 2"), in violation
5 of Title 18, United States Code, Section 892.

6 b. As charged in Count Thirteen of this Indictment,
7 which is incorporated by reference as if set forth in full
8 herein, on or about and between February 10, 1992 and July, 1992,
9 in the Northern District of California, PETER CHONG, Raymond
10 Chow, Norman Sun, and others known and unknown to the Grand Jury,
11 participated in the use of any extortionate means, as that term
12 is defined in 18 U.S.C. § 891(7), to collect and attempt to
13 collect any extensions of credit from, and punish for the
14 nonrepayment of any extensions of credit, a person whose identity
15 is known to the Grand Jury ("extortionate victim 2"), in
16 violation of Title 18, United States Code, Section 894.

17 Racketeering Act Nine

18 As charged in Count Fourteen of this Indictment, which
19 is incorporated by reference as if set forth in full herein, on
20 or about and between February, 1992 and May, 1992, in the
21 Northern District of California, PETER CHONG, Raymond Chow, and
22 others known and unknown to the Grand Jury, made extortionate
23 extensions of credit, as that term is defined in 18 U.S.C. §
24 891(6), to a person whose identity is known to the Grand Jury
25 ("extortionate victim 4"), in violation of Title 18, United
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1 States Code, Section 892.

2 Racketeering Act Ten

3 As charged in Count Fifteen of this Indictment, which
4 is incorporated by reference as if set forth in full herein, from
5 on or about and between February 1, 1992 and February 28, 1992,
6 in the Northern District of California, PETER CHONG, Raymond
7 Chow, and others known and unknown to the Grand Jury, made
8 extortionate extensions of credit, as that term is defined in 18
9 U.S.C. § 891(6), to a person whose identity is known to the Grand
10 Jury ("extortionate victim 5"), in violation of Title 18, United
11 States Code, Section 892.

12 Racketeering Act Eleven

13 On or about and between early 1990 and July, 1992, in
14 the Northern District of California, PETER CHONG, Raymond Chow,
15 Anthony Ma, and others known and unknown to the Grand Jury, did
16 operate a pool selling and bookmaking operation, with and without
17 writing, in the Chinatown section of San Francisco, California
18 and elsewhere, in violation of California Penal Code § 337a.1.

19 COLLECTION OF UNLAWFUL DEBTS

20 12. The collection of unlawful debts through which PETER
21 CHONG, Raymond Chow, Norman Sun, Margie Lee, Linh Cuong-Viet, and
22 others known and unknown to the Grand Jury, conducted and
23 participated, directly and indirectly, in the conduct of the
24 affairs of the enterprise, consisted of the following:

25 Collection of Unlawful Debt 1

1 From on or about May 1991, to June 1992, in the
2 Northern District of California, PETER CHONG, Raymond Chow,
3 Margie Lee, and Ling Cuong-Viet, did knowingly and unlawfully
4 collect and cause to be collected an unlawful debt, as defined by
5 Title 18, United States Code, Section 1961(6), that is, a debt
6 that was unenforceable under the laws of California (California
7 Civil Code §§ 1916-1 through 1916-3; California Constitution Art.
8 15, § 1), in whole or in part as to principal or interest because
9 of the laws relating to usury, and which was incurred in
10 connection with the business of lending money or anything of
11 value at a rate usurious under the aforementioned laws of
12 California, where the usurious rate was at least twice the
13 enforceable rate, from an individual whose identity is known to
14 the Grand Jury ("extortionate victim # 1").

15 Collection of Unlawful Debt 2

16 From on or about February 10, 1992 to July 1992, in the
17 Northern District of California, PETER CHONG, Raymond Chow, and
18 Norman Sun, did knowingly and unlawfully collect and cause to be
19 collected an unlawful debt, as defined by Title 18, United States
20 Code, Section 1961(6), that is, a debt that was unenforceable
21 under the laws of California (California Civil Code §§ 1916-1
22 through 1916-3; California Constitution Art. 15, § 1), in whole
23 or in part as to principal or interest because of the laws
24 relating to usury, and which was incurred in connection with the
25 business of lending money or anything of value at a rate usurious
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1 under the aforementioned laws of California, where the usurious
2 rate was at least twice the enforceable rate, from an individual
3 whose identity is known to the Grand Jury ("extortionate victim #
4 2").

5 Collection of Unlawful Debt 3

6 From on or about February 1992 to May 1992, in the
7 Northern District of California, PETER CHONG and Raymond Chow did
8 knowingly and unlawfully collect and cause to be collected an
9 unlawful debt, as defined by Title 18, United States Code,
10 Section 1961(6), that is, a debt that was unenforceable under the
11 laws of California (California Civil Code §§ 1916-1 through 1916-
12 3; California Constitution Art. 15, § 1), in whole or in part as
13 to principal or interest because of the laws relating to usury,
14 and which was incurred in connection with the business of lending
15 money or anything of value at a rate usurious under the
16 aforementioned laws of California, where the usurious rate was at
17 least twice the enforceable rate, from an individual whose
18 identity is known to the Grand Jury ("extortionate victim # 4").

19 Collection of Unlawful Debt 4

20 From on about February 1, 1992 to February 28, 1992, in
21 the Northern District of California, the PETER CHONG and Raymond
22 Chow, did knowingly and unlawfully collect and cause to be
23 collected an unlawful debt, as defined by Title 18, United State
24 Code, Section 1961(6), that is, a debt that was unenforceable
25 under the laws of California (California Civil Code §§ 1916-1
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1 through 1916-3; California Constitution Art. 15, § 1), in whole
2 or in part as to principal or interest because of the laws
3 relating to usury, and which was incurred in connection with the
4 business of lending money or anything of value at a rate usurious
5 under the aforementioned laws of California, where the usurious
6 rate was at least twice the enforceable rate, from an individual
7 whose identity is known to the Grand Jury ("extortionate victim #
8 5").

9 All in violation of Title 18, United States Code, Section
10 1962(c).
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1 COUNT TWO

18 U.S.C. § 1962(d)

2 The Grand Jury further charges:

3 1. The allegations contained in paragraphs One through
4 Twelve of Count One of this Indictment are realleged in this
5 Count and are incorporated by reference as if fully set forth
6 herein.

7 2. From in or about early 1990 until at least June, 1992
8 in the Northern District of California, PETER CHONG, Raymond
9 Chow, Wayne Kwong, Anthony Ma, Michael Eng, Andy Li, Norman Sun,
10 Margie Lee, Linh Cuong-Viet, Fee Yue, Brandon Casey, Tony Young,
11 and others known and unknown to the Grand Jury, defendants
12 herein, being persons employed by and associated with the
13 enterprise described in paragraph 2 of Count One, which was
14 engaged in and the activities of which affected interstate and
15 foreign commerce, unlawfully did combine, conspire, confederate,
16 and agree with each other, and with persons known and unknown to
17 the Grand Jury, to conduct and participate, directly and
18 indirectly, in the conduct of the affairs of the above-described
19 enterprise through a pattern of racketeering activity, as defined
20 by Title 18, United States Code, Sections 1961(1) and 1961(5) and
21 through collection of unlawful debts, as defined by Title 18,
22 United States Code, Section 1961(6).

23 3. It was part of the conspiracy that the defendants and
24 their co-conspirators would commit acts of racketeering activity,
25 as specified in paragraph 11 of Count One and collections of
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1 unlawful debt as specified in paragraph 12 of Count One.

2 4. It was part of the conspiracy that PETER CHONG, Raymond
3 Chow, Wayne Kwong, Anthony Ma, Michael Eng, Andy Li, Norman Sun,
4 Margie Lee, Linh Cuong-Viet, Fee Yue, Brandon Casey, Tony Young,
5 and others known and unknown to the Grand Jury, each agreed that
6 one or more of them would commit at least two of the charged acts
7 of racketeering and at least one of the charged collections of
8 unlawful debt.

9 Overt Acts

10 5. In furtherance of the above-described conspiracy and to
11 effect the objects thereof, the defendant, PETER CHONG, and other
12 conspirators, committed the following overt acts, among others,
13 in the Northern District of California and elsewhere:

14 (a) On or about August 6, 1991, PETER CHONG, Raymond
15 Chow, and Wayne Kwong met and discussed the San Francisco Wo Hop
16 To and Hop Sing Tong.

17 (b) In September, 1991, PETER CHONG, while visiting a
18 gambling den in San Francisco's Chinatown, collected a protection
19 fee from a female gambling operator.

20 (c) In Late August or early September, 1991, PETER
21 CHONG sent a group of Wo Hop To underlings to Boston,
22 Massachusetts for the purpose of assassinating Bike Ming.

23 (d) In September, 1991, PETER CHONG advised Wayne
24 Kwong that CHONG provided large sums of money to Raymond Chow to
25 be used as the start up capital for a loansharking operation in
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1 San Francisco's Chinatown.

2 (e) In late 1991, PETER CHONG discussed with Wayne
3 Kwong the distribution of 350 units of heroin which PETER CHONG
4 stated was imported on ships from Taiwan to Philadelphia.

5 (f) In late September, 1991, upon returning to the
6 residence at 1220-24 47th Avenue, San Francisco, California, and
7 discovering that it was burned down, PETER CHONG told Wayne Kwong
8 that CHONG could not remove Kwong's clothing and personal
9 belongings because "as the house was being set on fire, across
10 the street, there was a woman observing the whole thing."

11 (g) On or about January 8, 1992, in a meeting at the
12 Holiday Inn in San Francisco's Chinatown, PETER CHONG, Raymond
13 Chow, and Anthony Ma, discussed the repayment of a \$16,000.00
14 loan with the person who had borrowed the money.

15 (h) On February 1, 1992, PETER CHONG, in a telephone
16 conversation, advised Raymond Chow that the pager seized from
17 PETER CHONG by the San Francisco Police Department was still in
18 operational mode; and further instructed Raymond Chow to advise
19 other members of the association of that fact.

20 (i) On February 1, 1992, PETER CHONG, in a telephone
21 conversation, asked Raymond Chow, "Do you know that you have
22 \$35,000.00 with me?"

23 (j) On February 9, 1992, PETER CHONG, in a telephone
24 conversation, advised Raymond Chow that PETER CHONG had just come
25 from speaking with his attorney and stated that "I might have to
26

1 leave town."

2 (k) On February 27, 1992, PETER CHONG, in a telephone
3 conversation, instructed Raymond Chow how to handle the
4 underlings in a rivalry with another street gang; and further
5 told Chow that "You can't tell me you have no part of Chinatown,
6 every time there is something good, I always asked you to go in."

7 (l) On March 3, 1992, PETER CHONG, in a telephone
8 conversation with Fei Mui, described Raymond Chow as "my partner"
9 and "my brother" and discussed illegal operations in San
10 Francisco's Chinatown.

11 (m) On March 30, 1992, Raymond Chow, in a telephone
12 conversation with defendant PETER CHONG concerning difficulties
13 in collecting money, advised PETER CHONG to "beat the hell" out
14 of the person who owed the money.

15 (n) On May 19, 1992, PETER CHONG, in a telephone
16 conversation placed from Hong Kong, discussed, with Raymond Chow,
17 the status of Anthony Ma's debt; and further stated to Raymond
18 Chow, "why don't you pack up and come over here...whatever you
19 make you get to enjoy it all because no one else is sharing with
20 you now."

21 All in violation of Title 18, United States Code, Section
22 1962(d).
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1 **COUNT THREE:**

18 U.S.C. § 371

2 The Grand Jury further charges:

3 1. That from on or about September, 1991, and continuing
4 thereafter until on or about April 23, 1992 in the Northern
5 District of California and elsewhere, PETER CHONG, Raymond Chow,
6 and Wayne Kwong, knowingly conspired and agreed together and with
7 other persons both known to and unknown to the Grand Jury, to
8 cause another to travel in interstate commerce from the State of
9 California to the State of Massachusetts with intent that the
10 murder of Bike Ming be committed in violation of the laws of
11 Massachusetts (Massachusetts General Laws, Chapter 265, Section
12 1), as consideration for the receipt of and as consideration for
13 a promise and agreement to pay anything of pecuniary value, in
14 violation of Title 18, United States Code, Section 1958.

15 2. In furtherance of the conspiracy and to effect the
16 objects of the conspiracy, the following overt acts, among
17 others, were committed in the Northern District of California and
18 elsewhere:

19 (a) In late August, 1991, PETER CHONG told Wayne Kwong
20 that should Bike Ming be a continuing problem in Boston, someone
21 should go to Boston and get rid of Bike Ming.

22 (b) In early September, 1991, PETER CHONG gave money
23 to Qui Tu Luong for the purpose of traveling to Boston,
24 Massachusetts to assassinate Bike Ming.

25 (c) In early 1992, PETER CHONG, Raymond Chow, and
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1 Wayne Kwong discussed the need to consolidate power in Boston's
2 Chinatown by eliminating, once and for all, Bike Ming.

3 (d) On or about March 8, 1992, in the Northern District
4 of California, Raymond Chow gave Brandon Casey and two juvenile
5 males, \$100.00 and airline tickets for travel from San Francisco,
6 California to Boston, Massachusetts for the purpose of
7 assassinating Bike Ming.

8 (e) On or about March 9, 1992, in the District of
9 Massachusetts, Wayne Kwong instructed Brandon Casey and two
10 juvenile males concerning the method and means of murdering Bike
11 Ming.

12 All in violation of Title 18 United States Code,
13 Section 371.
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18 U.S.C. §§ 1958 and 2

That on or about and between September, 1991 and April,

All in violation of Title 18, United States Code, Sections 1958 and 2.

1 COUNT FIVE:

21 U.S.C. § 846

2 The Grand Jury further charges:

3 1. That on or about and between January, 1991 and May 30,
4 1992, in the Northern District of California, the District of
5 Massachusetts, the District of New Jersey, and elsewhere, PETER
6 CHONG, Raymond Chow, Wayne Kwong, Anthony Ma, Michael Eng, and
7 Tim Huang did knowingly and intentionally conspire, combine,
8 confederate and agree together, with each other and with persons
9 known and unknown to the Grand Jury, to commit the offense of
10 knowingly and intentionally distributing heroin, a Schedule I
11 controlled substance, in violation of Title 21, United States
12 Code, Section 841 (a)(1).

13 2. It was part of the conspiracy that PETER CHONG, Raymond
14 Chow, and Wayne Kwong supervised the wholesale purchase of heroin
15 on the East Coast of the United States and transported and
16 distributed heroin to customers in the Northern and Central
17 Districts of California. Among the customers of the heroin
18 conspiracy was Chi-Ko Wong, who in March, 1992, became a
19 confidential informant of the Drug Enforcement Administration.
20 Chi-Ko Wong, in turn, introduced Special Agent Jose Calderon,
21 acting in an undercover capacity, to Raymond Chow. Raymond Chow,
22 on behalf of the conspiracy, agreed to secure heroin to sell to
23 Wong and Calderon.

24 3. It was part of the conspiracy that a primary source of
25 heroin was PETER CHONG who arranged for the importation of
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1 hundreds of units of heroin from Taiwan by ship into the Port of
2 Philadelphia. PETER CHONG tasked Wayne Kwong with the
3 distribution of the heroin to Raymond Chow on the West Coast of
4 the United States. PETER CHONG would arrange for the heroin to
5 be delivered to Wayne Kwong who, in turn, would make it available
6 to Raymond Chow. Raymond Chow would send underlings of the Hop
7 Sing Tong to secure samples of the heroin from Wayne Kwong.
8 Wayne Kwong would then arrange for the delivery of heroin to
9 Raymond Chow for distribution at the retail level.

10 4. In furtherance of this conspiracy and to effect and
11 accomplish the objects of it, one or more of the conspirators
12 committed the following overt acts, among others:

13 (a) In August, 1991, PETER CHONG informed Raymond Chow
14 and Wayne Kwong that the Tien Ha Wui would concentrate on taking
15 over nationwide importation and distribution of heroin.

16 (b) In late September or early October, 1991, PETER
17 CHONG informed Wayne Kwong that his past practice of using the
18 mail or mules to import and distribute heroin was no longer
19 efficient and that Kwong and Raymond Chow should prepare for
20 large scale distribution of heroin from the West Coast of the
21 United States.

22 (c) In October or November, 1991, PETER CHONG
23 requested Wayne Kwong to fly to San Francisco where PETER CHONG
24 informed him that he had 350 units of heroin available for
25 distribution.

1 (d) On March 29, 1992, in the Northern District of
2 California, Raymond Chow provided Chi-Ko Wong with a one ounce
3 sample of heroin.

4 (e) In May, 1992, a representative of PETER CHONG
5 provided Wayne Kwong with a sample of heroin to be delivered to
6 Raymond Chow in anticipation of a major distribution of heroin to
7 the West Coast of the United States.

8 (f) On or about May 8, 1992, in the Northern District
9 of California, Raymond Chow spoke on the telephone with defendant
10 Wayne Kwong concerning the delivery of heroin.

11 (g) On or about May 20, 1992, in the District of New
12 Jersey, Wayne Kwong arranged the delivery of a four ounce sample
13 of heroin to underlings of the Hop Sing Tong.

14 All in violation of Title 21, United States Code, Section
15 846.

1 COUNT SIX: 21 U.S.C. § 846

2 The Grand Jury further charges:

3 1. That on or about between January, 1991 and May, 1992, in
4 the Northern District of California, the Central District of
5 California, and elsewhere, PETER CHONG, Raymond Chow, Wayne
6 Kwong, Jordan Hoang, Andy Li, Kenneth De Fillipes, Corey Shing,
7 and Anna Ma did knowingly and intentionally conspire, combine,
8 confederate and agree together, with each other and with persons
9 known and unknown to the Grand Jury, to commit the offense of
10 knowingly and intentionally distributing cocaine, a Schedule II
11 controlled substance, in violation of Title 21, United States
12 Code, Section 841(a)(1).

13 2. It was part of the conspiracy that Raymond Chow would
14 purchase cocaine from sources, who imported the cocaine from
15 Mexico, to both sell at the retail level throughout the San
16 Francisco Bay area, and to transport back to the East Coast to
17 sell, with the proceeds of such sales being used, in part, to
18 purchase heroin in furtherance of the conspiracy charged in Count
19 Five of this Indictment.

20 3. It was part of the conspiracy that one source of
21 cocaine was Kenneth De Fillipes of Los Angeles, who supplied
22 cocaine that he imported, through the use of runners, from
23 Mexico.

24 4. It was part of the conspiracy that Raymond Chow
25 negotiated with Special Agent Jose Calderon, acting in an
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1 undercover capacity, for the purchase of a multiple-kilogram
2 quantity of cocaine.

3 5. In furtherance of this conspiracy and to effect and
4 accomplish the objects of it, one or more of the conspirators
5 committed the following overt acts, among others:

6 (a) In September, 1991, PETER CHONG informed Wayne
7 Kwong that Raymond Chow had cocaine contacts in Mexico who could
8 supply cocaine at \$10,000.00 to \$12,000.00 per kilo.

9 (b) In September, 1991, PETER CHONG stated that he,
10 Raymond Chow, and Wayne Kwong should use the association called
11 the Tien Ha Wui to arrange for the transportation of cocaine from
12 the West Coast to the East Coast of the United States.

13 (c) On April 2, 1992, at 10:13 P.M., in the Northern
14 District of California and elsewhere, Kenneth De Fillipes and his
15 partner, "George", in a telephone conversation with Raymond Chow,
16 discussed the delivery and price of cocaine from Mexico.

17 (d) On May 13, 1992, in the Central District of
18 California, Raymond Chow informed Special Agent Jose Calderon
19 that he was prepared to purchase \$100,000.00 worth of
20 cocaine.

21 All in violation of Title 21, United States Code, Section
22 846.

1 **COUNT SEVEN:** 18 U.S.C. § 1951

2 The Grand Jury further charges:

3 1. That between in or about January, 1991 through May,
4 1992, in the Northern District of California and elsewhere, **PETER**
5 **CHONG** and Raymond Chow knowingly conspired and agreed together
6 and with other persons both known and unknown to the Grand Jury,
7 to obstruct, delay, and affect commerce by extortion (to wit, the
8 obtaining of property from another, with his consent, induced by
9 wrongful use of actual and threatened force, violence, and fear)
10 of operators of gambling dens and restaurants in the Chinatown
11 section of San Francisco, California.

12 2. In furtherance of the conspiracy and to effect the
13 objects of the conspiracy, the following overt acts, among
14 others, were committed in the Northern District of California and
15 elsewhere:

16 (a) In or about January, 1992, **PETER CHONG** ordered an
17 owner of a restaurant to provide periodic payments to an
18 individual named Duck Jai in order to prevent further harassment
19 and intimidation.

20 (b) Between January, 1991 and May, 1992, **PETER CHONG**
21 instructed the owner of a restaurant in San Francisco's Chinatown
22 to permit **CHONG's** underlings to eat without paying for the food.

23 (c) In September, 1991, **PETER CHONG** informed Wayne
24 Kwong that he received protection fees from various illegal
25 gambling dens in San Francisco.

1 All in violation of Title 18, United States Code, Section
2 1951.
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1 COUNT EIGHT: 18 U.S.C. § 844(i) and 2

2 The Grand Jury further charges:

3 That on or about September 21, 1991, in the Northern
4 District of California and elsewhere, PETER CHONG, Raymond Chow,
5 Andy Li, and Lee Chol-Soo, maliciously damaged and attempted to
6 damage, by means of fire, a building (to wit, 1220-24 47th
7 Avenue, San Francisco) used in, and which affected, interstate
8 and foreign commerce.

9 All in violation of Title 18, United States Code, Sections
10 844(i) and 2.

1 COUNT NINE: 18 U.S.C. § 892

2 The Grand Jury further charges:

3 1. That from on or about March, 1991 through July, 1992, in
4 the Northern District of California and elsewhere, **PETER CHONG**,
5 Raymond Chow, Norman Sun, Margie Lee, Linh Cuong-Viet, and others
6 known and unknown to the grand jury, did knowingly and
7 intentionally conspire, confederate, and agree to make
8 extortionate extensions of credit, as that term is defined in 18
9 U.S.C. § 891(6).

10 2. It was part of the conspiracy that defendants **PETER**
11 **CHONG** and Raymond Chow supervised the solicitation and evaluation
12 of requests to borrow money made by: (i) individuals who owed
13 money as the result of gambling losses; and (ii) other
14 individuals in the Chinese communities of the San Francisco Bay
15 area.

16 3. It was part of the conspiracy that Margie Lee, Norman
17 Sun, and Linh Cuong-Viet assisted **PETER CHONG** and Raymond Chow by
18 soliciting requests for loans and communicating those requests.

19 4. It was part of the conspiracy that defendants **PETER**
20 **CHONG** and Raymond Chow would make the decision as to whether a
21 loan should be extended. The prevailing rate of the loans was
22 from between 7% to 10% per week (364% to 520% per annum).

23 5. It was part of the conspiracy that each of the
24 defendants would communicate the decision to extend the loan and
25 would directly, or through others, deliver the loan, often with
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1 the first week's payment already deducted, to the "customer."

2 6. In furtherance of this conspiracy and to effect and
3 accomplish the objects of it, one or more of the conspirators
4 committed, among others, the following overt acts:

5 (a) In September, 1991, PETER CHONG told Wayne Kwong
6 that he paid Linh Cuong-Viet, \$5,000.00 per month for debt-
7 collection service.

8 (b) In December, 1991, PETER CHONG told Wayne Kwong
9 that CHONG and Raymond Chow would lend out money at a rate of 7
10 to 10% per week.

11 (c) In or about September, 1991, Raymond Chow and Linh
12 Cuong-Viet extended a \$9,000.00 loan to extortionate victim 1;
13 and Raymond Chow instructed extortionate victim 1 that Linh
14 Cuong-Viet was in charge of the loan.

15 (d) On February 12, 1992, PETER CHONG, in a telephone
16 conversation with defendant Raymond Chow, discussed whether
17 "they" should make a \$3,000.00 loan.

18 (e) On May 20, 1992, Raymond Chow agreed to loan money
19 to "Danny Boy" based upon the following request by the caller,
20 Lolitta Wong, "If you are loaning to him, then I don't have to
21 worry about it anymore...He asked me if I knew any loansharks."

22 All in violation of Title 18, United States Code, Section
23 892.

1 COUNT TEN: 18 U.S.C. § 894

2 The Grand Jury further charges:

3 1. That from on or about March, 1991 through July, 1992, in
4 the Northern District of California and elsewhere, PETER CHONG,
5 Raymond Chow, Norman Sun, Margie Lee, Linh Cuong-Viet, and others
6 known to the grand jury, did knowingly and intentionally
7 conspire, confederate, and agree, to knowingly participate, in
8 the use of extortionate means, as that term is defined in 18
9 U.S.C. § 891(7), to collect and attempt to collect any extensions
10 of credit, as that term is defined in 18 U.S.C. § 891(6), and to
11 punish any person for the nonrepayment of the extensions of
12 credit.

13 2. It was part of the conspiracy that the defendants would
14 collect, on a weekly basis, the interest (and principal) due and
15 owing from the customers. PETER CHONG and Raymond Chow decided
16 whether the payment could be deferred and what actions, if any,
17 should be taken in the event that payment was not made.

18 3. It was part of the conspiracy that PETER CHONG and
19 Raymond Chow would authorize the use of threats of physical
20 violence and the commission of acts of physical violence, when
21 deemed necessary, to both collect loan payments and punish
22 customers who had not met their payments.

23 4. It was further part of the conspiracy that PETER CHONG
24 and Raymond Chow were aware of the fact that they and other
25 individuals they used in the collection of debts, had, in the
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1 community of which the debtors were members, reputations as
2 individuals who would use extortionate and violent means to
3 collect funds and punish those who did not pay such funds.

4 5. In furtherance of this conspiracy and to effect and
5 accomplish the objects of it, one or more of the conspirators
6 committed, among others, the following overt acts:

7 (a) On February 10, 1992, Norman Sun, in a telephone
8 conversation, advised defendant Raymond Chow that "Taiwan Boy
9 can't make the payment and wants us to cut it."

10 (b) On February 15, 1992, in a telephone conversation,
11 "Taiwan Boy" asked defendant Raymond Chow to get defendant Norman
12 Sun to stop his attempts at collecting the debt; stating "he has
13 threatened to burn down my house and beat me up." Raymond Chow
14 stated that Norman Sun, Taiwan Boy, and himself should meet to
15 discuss the situation.

16 (c) On February 23, 1992, PETER CHONG, in a telephone
17 conversation with two unidentified males, instructed them, in
18 reference to a customer who had not made his payment, to "slap
19 him and let him know what it means to hurt."

20 (d) On March 30, 1992, Raymond Chow, in a telephone
21 conversation with PETER CHONG, suggested that defendant CHONG
22 should "beat the hell" out of "Taylor", a customer who had not
23 made his payment.

24 All in violation of Title 18, United States Code, Section
25 894.

1 COUNT ELEVEN: 18 U.S.C. §§ 892 and 2.

2 The Grand Jury further charges:

3 From on or about and between May, 1991 and June, 1992, in
4 the Northern District of California, PETER CHONG, Raymond Chow,
5 Margie Lee, and Linh Cuong-Viet, made extortionate extensions of
6 credit, as that term is defined in 18 U.S.C. § 891(6), to a
7 person whose identity is known to the Grand Jury ("extortionate
8 victim 1").

9 All in violation of Title 18, United States Code, Sections
10 892 and 2.

1 COUNT TWELVE: 18 U.S.C. §§ 892 and 2.

2 The Grand Jury further charges:

3 From on or about and between March, 1991 and July, 1992, in
4 the Northern District of California, PETER CHONG, Raymond Chow,
5 and Norman Sun, made extortionate extensions of credit, as that
6 term is defined in 18 U.S.C. § 891(6), to a person whose identity
7 is known to the Grand Jury ("extortionate victim 2").

8 All in violation of Title 18, United States Code, Sections
9 892 and 2.

1 COUNT THIRTEEN: 18 U.S.C. §§ 894 and 2.

2 The Grand Jury further charges:

3 From on or about and between February 10, 1992 and July,
4 1992, in the Northern District of California, PETER CHONG,
5 Raymond Chow and Norman Sun, participated in the use of
6 extortionate means, as that term is defined in 18 U.S.C. §
7 891(7), to collect and attempt to collect any extensions of
8 credit, as that term is defined in 18 U.S.C. § 891(6) from, and
9 punish for the nonrepayment of any extensions of credit, a person
10 whose identity is known to the Grand Jury ("extortionate victim
11 2").

12 All in violation of Title 18, United States Code, Section
13 894.
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1 COUNT FOURTEEN: 18 U.S.C. §§ 892 and 2.

2 The Grand Jury further charges:

3 From on or about and between February, 1992 and May, 1992,
4 in the Northern District of California, PETER CHONG and Raymond
5 Chow, made extortionate extensions of credit, as that term is
6 defined in 18 U.S.C. § 891(6), to a person whose identity is
7 known to the Grand Jury ("extortionate victim 4").

8 All in violation of Title 18, United States Code, Sections
9 892 and 2.
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1 **COUNT FIFTEEN:** 18 U.S.C. §§ 892 and 2.

2 The Grand Jury further charges:

3 From on or about and between February 1, 1992 and February
4 28, 1992, in the Northern District of California, **PETER CHONG** and
5 Raymond Chow made extortionate extensions of credit, as that term
6 is defined in 18 U.S.C. § 891(6), to a person whose identity is
7 known to the Grand Jury ("extortionate victim 5").

8 All in violation of Title 18, United States Code, Sections
9 892 and 2.

10 A TRUE BILL

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14 FOREPERSON

15 *Michael J. Yamaguchi*
16 *by Charles B. Boud*
17 MICHAEL J. YAMAGUCHI
18 United States Attorney

19 Approved as to form: *William P. Schaefer*
20 William P. Schaefer
21 Assistant United States Attorney
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